

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

CORIE REED,
on behalf of herself and all others similarly
situated,

Plaintiff,

v.

MRS BPO, LLC d/b/a MRS
ASSOCIATES OF NEW JERSEY,

Defendant.

Case No. 21-4066

Judge:

NOTICE OF REMOVAL

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

Pursuant to 28 U.S.C. §§ 1331 and 1441 *et seq.*, and 15 U.S.C. § 1692 *et seq.*, defendant, MRS BPO, LLC d/b/a MRS Associates of New Jersey ("Defendant"), hereby gives notice of removal of this cause of action, under the caption *Corie Reed, on behalf of herself and all others similarly situated v. MRS BPO, LLC d/b/a MRS Associates of New Jersey*, from the Circuit Court, County of Cook, State of Illinois ("State Court Action") to the United States District Court for the Northern District of Illinois. In support of removal, Defendant, by and through its attorneys, states as follows:

1. Defendant was served on July 1, 2021. The matter was venued in the Circuit Court, County of Cook, State of Illinois. True and correct copies of the state court pleadings are attached hereto and marked as Exhibit "1".

2. This action is a civil action of which this Honorable Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by

Defendant pursuant to 28 U.S.C. § 1441 in that it presents a federal question, wherein Plaintiff alleges violations of the Fair Debt Collection Practices Act (“FDCPA”).

3. As Defendant was served on July 1, 2021, this removal is timely.

4. Notice of this removal will be sent to Circuit Court, County of Cook, State of Illinois and served on Plaintiff.

WHEREFORE, Defendant requests that further proceedings in the Circuit Court, County of Cook, State of Illinois, be discontinued and that this action be removed in its entirety to the United States District Court for the Northern District of Illinois, which will then assume full jurisdiction over this cause of action.

Dated: July 30, 2021

s/Bradley R. Armstrong
Attorneys for Defendant

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CERTIFICATE OF SERVICE

I certify that on July 30, 2021, a copy of the foregoing document was filed electronically in the ECF system. I also certify that a copy was served upon the following parties via U.S. mail:

Celetha Chatman
Community Lawyers LLC
980 N. Michigan Ave., Suite 1400
Chicago, IL 60611

/s/ Bradley R. Armstrong
One of the attorneys for Defendant